I.   INTRODUCTION

In response to the Office Action dated August 9, 2007, the claims have not been amended. Claims 1, 3-8, 10-15, and 17-21 remain in the application. Entry of these amendments, and re-consideration of the application, as amended, is requested.

II.   IMPROPER REJECTION

Applicants' note that in the prior petition filed under 37 CFR 1.181 and the present response, it was noted that copies of the cited references were not provided to Applicants. In this regard, the rejections continue to recite pages 230-238 of Clevenger. Applicants note that nowhere in the cited non-patent literature is there any reference to pages 230-238. In this regard, Applicants cannot be expected to fully respond to the rejections when the art relied upon in the rejection has not been provided to Applicants.

Nonetheless, Applicants have searched the Internet and found the Clevenger reference. By searching for the text cited in the rejection, the appropriate pages were found. Regardless, Applicants respectfully request an updated PTO-892 that accurately reflects the pages relied upon by the Patent Office to reject the claims. Further, the withdrawal of the finality of the Office Action is respectfully requested.

III.   PRIOR ART REJECTIONS

On pages (2)-(6) of the Office Action, claims 1, 3-8, 10-15 and 17-21 were rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of Clevenger et al., http://www.daz3d.com/program/bryce/Bryce5_Manual_DAZ.pdf (Clevenger) and Parametric Technology Corporation et al., http://www.ptc.com/company/mail/express2002021download_guide.htm (Parametric). On pages (6)-(7) of the Office Action, claims 7, 14 and 21 were rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of Clevenger and SkySof Software, CAD.OCX 1; http://www.download.com/CAD-OCX/3000-6677_4-1400022.html?tag=1st-2-1) (SkySof). Applicants respectfully traverse these rejections.

Specifically, the independent claims were rejected as follows:

As to independent claims 1, 8, and 15, Clevenger teaches a method and corresponding apparatus and article for displaying a graphical illustration of an object in a computer graphics program (PDF page 129, column 1, paragraph 5), comprising elements, steps and means for: a computer having a memory (PDF pg. 12, col.1 and PDF pg. 126, par. 5); an application executing on the computer, wherein the application is configured to obtaining an object in a computer graphics program (PDF pg. 129, col. 1, par. 6); displaying a properties palette for the object (PDF pg. 130, Figure 1, col. 1), wherein the properties palette comprises one or more object properties having corresponding property values (PDF pg. 131, col. 1, par. last and col. 2 par. 1-2); displaying a graphical illustration of the object in the properties palette (PDF pg. 130, Figure 1).

Clevenger teaches the use of keynotes of object properties within the same window/ palette (pages 230-238). Clevenger does not specifically mention the use of keynotes in the object palette. However in the same field of endeavor PTC teaches wherein one or more of the object properties, in the properties palette, are keynoted to refer to corresponding keynotes displayed in the graphical illustration in the properties palette (PDF pg. 29, Fig. 1 and PDF pg. 172, Fig. 1; wherein the user selects an option from the palette to show a display view of an object with keynotes pointing to different parameters of the object, to where the keynotes are dictated in an organized manner to accommodate the user). It would have been obvious to one skilled in the art at the time of the invention to combine the keynotes of a three dimensional object for use of pointing out different parameters of a three dimensional object into the editing palette of a three dimensional object that has parameters associated by values as defined by a user of Clevenger. The motivation to combine being that of PTC is a program designed to accommodate a user in the design process of three dimensional modeling (PDF pg.20, par.3, line 1) which is in the same field of endeavor of Clevenger which also accommodates a user in the design process of three dimensional modeling. Of course, those skilled in the art will appreciate that the function and idea of providing a graphical indication of what the user is currently selecting is very well known and no longer novel.

Note: Clevenger teaches a means of keynoting, wherein a graphical indication is displayed to the user of controls and effected areas of the controls therein of a three-dimensional object (see pages 230-238). The object being displayed in the window also can be construed as being a palette as seen on page 8 of Clevenger, wherein is depicted editable controls with a display of a three dimensional object.

Applicants traverse the above rejections for one or more of the following reasons:

(1)   Clevenger, Parametric, and SkySof do not teach, disclose or suggest the use of keynotes in a properties palette; and

(2)   Clevenger, Parametric, and SkySof do not teach, disclose or suggest keynoting properties that are displayed in a properties palette.

Independent claims 1, 8 and 15 are generally directed to the use of a properties palette in a computer graphics program. More specifically, a properties palette having object properties and corresponding values for the object are displayed in a properties palette. In addition, a graphical illustration of the object is displayed in the properties palette. Further, the claims provide that the properties in the properties palette are keynoted to refer to keynotes displayed in the graphical illustration in the properties palette. Thus, from within the properties palette, you can graphically see which properties correspond to which actual attributes of the displayed object.

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The dependent claims further provide for changing various properties and the illustration within the properties will update to reflect the changes. Further, if a property is highlighted in the graphical illustration (e.g., a keynote is selected), the corresponding object property is highlighted (and vice versa).

The cited references do not teach nor suggest these various elements of Applicants' independent claims.

In rejecting the display of the properties palette, the Office Action relies on PDF page 130 of Clevenger, Figure 1, col. 1. Such text of Clevenger merely describes a tree preview screen that displays a resulting tree object based on changes made in a tree lab. As stated explicitly in Clevenger, the tree preview does not update automatically. Instead, after a series of changes are made, the tree preview must be clicked to update the screen. Of particular note is that Clevenger lacks any discussion about keynotes and displaying such keynotes in a properties palette.

The next claim element provides that the object properties in the properties palette are keynoted to refer to corresponding keynotes displayed in the graphical illustration in the properties palette. First, the Office Action alleges that Clevenger teaches the use of keynotes of object properties within the same window/palette (pages 230-238). However, the next sentence of the rejection provides that Clevenger does not specifically mention the use of keynotes in the object palette. Thereafter, the Action relies on PTC to teach the keynote aspects. Pages 230-238 of Clevenger illustrate object attribute icons that appear as a list of buttons along the right side of an object's bounding box. Clevenger describes that the buttons let you perform various actions.

However, the ability to click a button to edit an object's properties is not even remotely similar to keynoted properties of an object. As is known, keynoting a drawing refers to providing labels within a drawing that are keyed or noted to correspond with a reference elsewhere (e.g., within text). In fact, keynoting is common in patent application drafting when a drawing contains labels or keynotes and such labels/keynotes are referred to in the text of a specification. To equate the use of a button or object attribute icon with a label of a part in a drawing or a keynote in a drawing is wholly without merit. In this regard, without a keynote, the appearance of a button (without clicking the button) would not provide any information as to what property of a drawing is being adjusted. In other words, if a button or object attribute icon were displayed next to an object, the user would

have no way to know which portion of the actual object corresponds to the object attribute in the icon.

The present claims provide that the object properties displayed in the properties palette are keynoted to correspond to the keynotes displayed in the graphical illustration. In other words, there are two locations for the keynotes to appear – once in the properties palette, and next in the actual graphical illustration. No such keynotes appear anywhere in Clevenger.

The Office Action also relies on PTC. Applicants respectfully traverse such a rejection. PTC merely describes the ability to create a bill of materials consisting of a report table. A bill of materials (or BOM) merely describes a product in terms of its assemblies, sub-assemblies, and basic parts and consists of a list of parts (see en.wikipedia.org/wiki/Bill_of_materials).

Such a teaching of a BOM is clearly differentiable from the present invention. First, the BOM is not part of a properties palette. A properties palette has a specific meaning as understood in the art and as set forth in the claims and specification. In this regard, the claims provide that the properties palette have object properties and corresponding values. A BOM does not even remotely describe or allude to such a palette. Instead, a BOM is merely a static table listing the various components of a product.

The present invention provides distinct advantages by having the ability to have keynoted properties within the properties palette. For example, see paragraphs [0010] and [0011] of the present invention:

> **[0010]** Object viewers may be used to provide a preview image or keynoted illustration of an object. In the prior art, such an object viewer is presented in a separate window/dialog from that where the properties may be viewed and edited. Accordingly, the user must undertake multiple actions to actually view a graphical representation of an object and the properties (i.e., multiple windows must be physically opened). Such a requirement and use of multiple actions/tasks is inconvenient and cumbersome.
> **[0011]** Accordingly, what is needed is the capability to view an object's properties while simultaneously viewing a graphical representation of the object that may (or may not) be dynamically updated as the properties are changed.

In view of the description of the prior art, the BOM clearly falls within the prior art. Namely, the BOM is not within a properties palette and provides a static listing. However, a properties palette provides dynamic property values which can easily be identified in the displayed illustration via the keynotes. Consequently, PTC does not even remotely teach, describe, or suggest the use of a properties palette or keynotes in such a properties palette.

Further, there is not even a remote suggestion to combine the BOM of PTC with the tree view or object attribute icons of Clevenger. Further, even if combined, the present invention would not result. Instead, the combination would produce Clevenger's icons to be used to edit property values and a completely separate BOM without links from the property icons to the displayed graphical keynotes.

The dependent claims provide further advantages (i.e., with respect to the highlighting of the keynotes and vice versa) that are note even remotely contemplated by either PTC or Clevenger. Nor are such claims result from the combination of PTC with Clevenger.

Moreover, the various elements of Applicants' claimed invention together provide operational advantages over Clevenger, PTC and SkySof. In addition, Applicants' invention solves problems not recognized by Clevenger, PTC and SkySof.

Thus, Applicants submit that independent claims 1, 8 and 15 are allowable Clevenger, PTC and SkySof. Further, dependent claims 3-7, 10-14 and 17-21 are submitted to be allowable over Clevenger, PTC and SkySof in the same manner, because they are dependent on independent claims 1, 8 and 15, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 3-7, 10-14 and 17-21 recite additional novel elements not shown by Clevenger, PTC and SkySof.

IV. CONCLUSION

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

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By their attorneys,

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